

### **REMARKS/ARGUMENTS**

Applicants thank the Examiner for the thorough consideration given the present application. Claims 1-3 are pending in this application. This amendment amends claim 1. Claims 1-3 have been rejected under the provisions of 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 5,926,208 (Noonen, et al.) in view of U.S. Patent 6,434,196 (Sethuraman, et al.) and in further view of an article entitled "Video DSP Architecture for MPEG2 CODEC" by T. Araki, et al.

### **Drawings**

The Examiner has not acknowledged that the formal drawings filed on March 29, 2001 have been accepted. The Applicants respectfully request that the Examiner acknowledge the acceptance of the drawings in the next communication.

### **Claim for Priority**

The Examiner has not acknowledged the Applicants' claim for foreign priority. Accordingly, it is respectfully requested that in the next communication, the Examiner acknowledge the Applicants' claim for foreign priority.

### **Acknowledgement of Information Disclosure Statement**

The Examiner has acknowledged that the Information Disclosure Statement filed on March 29, 2001 has been initialed and considered by the Examiner. An initialed copy of the PTO-1449 form has been received from the Examiner. Accordingly, no further action is necessary at this time.

**Rejection of Claims 1-3 under 35 U.S.C. § 103(a)**

The Office Action has rejected claims 1-3 under the provisions of 35 U.S.C. § 103(a) as being unpatentable over Noonan, et al. in view of Sethuraman, et al. and further in view of the article by Araki, et al. This rejection of amended claims 1-3 is traversed. The Applicants respectfully submit that amended claim 1 is patentable over the combination of Noonan, et al. in view of Sethuraman, et al. and further in view of the Araki, et al. article, and the Examiner is respectfully requested to withdraw the rejection.

**A. The Noonan, et al. Patent**

The Office Action relies upon Figure 3 of the Noonan, et al. patent as allegedly disclosing an image processing device comprising a video processor (1038), a VLC (262), an external data interface (214), instruction memory (152, 222, 224, and 226) and a processor means (1038) for decoding the instruction held by the instruction memory and performing a program controlled operation on the video processor, the VLC processor and the external data interface. The Examiner has acknowledged that the Noonan, et al. patent does not teach the use of an SIMD calculating means for performing various operations. The Applicants also want to point out that Noonan appears to disclose plural compression systems and that Noonan may disclose a video processor having DCT and IDCT units.

**B. The Sethuraman, et al. Patent**

The Examiner has further alleged that the Sethuraman, et al. patent teaches an image processing device (100, Fig. 1) comprising an SIMD calculating means (1400, Fig. 14B) for performing operations by means of a pipeline operation unit that can be controlled by an outside unit. The Examiner has acknowledged that the Sethuraman, et al. patent does not teach a VLC for performing a variable-length decoding of the type being claimed by the Applicants. The Applicants also want to point out that Sethuraman, et al. appears to disclose only a single MPEG-type compression system, and an SIMD having DCT/IDCT units.

**C. The Araki et al. Article**

The Examiner has further alleged that the Araki, et al. article discloses a VLC/VLD processor which can flexibly support various specifications including MPEG1, MPEG2 as well as other standards. The Araki et al. Article may also arguably disclose an SIMD at page 418, col. 1, line 3. The Applicants believe, however, that while the Araki et al. article may disclose plural compression systems, it does not disclose an SIMD having integrated DCT/IDCT units.

**D. Claims 1-3 are Patentable over the Cited Prior Art**

Amended claim 1 is directed to an image processing device having a *DCT unit and IDCT unit integrated in an SIMD*. It is respectfully submitted that one skilled in the art would not combine the references cited by the Examiner in order to make the

invention of amended claim 1. More specifically, the Applicants believe that one skilled in the art would not combine the plural compression systems of Noonen, et al. and Araki, et al. with the single (MPEG2) system of Sethuraman, et al. Moreover, no combination of features from the plural compression systems of Noonen, et al. and Araki, et al. would teach or suggest the subject matter of amended claim 1. Accordingly, it is respectfully submitted that amended claim 1 is patentable over the cited prior art references.

It is also respectfully submitted that claims 2 and 3, which depend from claim 1, are patentable over the cited prior art for at least the same reasons as claim 1.

#### **Conclusion**

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Richard J. McGrath (Reg. No. 29,195) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.


If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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